

**EXHIBIT 27**

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**DREW J. RIBAR, Pro Se Plaintiff**

3480 Pershing Ln

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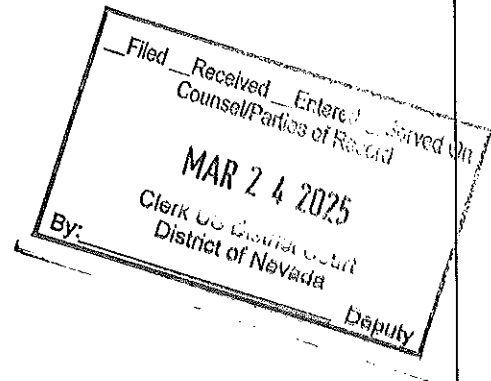
Const2Audit@gmail.com

**v.**

**WASHOE COUNTY, et al.**

**Defendants.**

**Case No.: 3:24-cv-00526-ART-CLB**



**EXHIBIT 27**

**Title:** Video Recording of June 15, 2023, Drag Queen Story Hour at the Reno Library

**Date of Recording:** June 15, 2023

**Source:** Plaintiff's Personal Recording

**Bates Number Range:** Video 1

**DESCRIPTION**

PLEADING TITLE - 1

1 This exhibit is a **video recording** documenting events at the Reno Library during **Drag Queen**  
 2 **Story Hour (DQSH) on June 15, 2023**. The footage provides direct evidence of constitutional  
 3 violations, including **unlawful restrictions on public access, discriminatory enforcement of**  
 4 **policies, and suppression of protected speech.**

#### 6 **Key Incidents Captured in Video**

#### 8 **✓ Coordination Between Washoe County Library & Build Our Center (State Actor Nexus** 9 **Evidence)**

- 11 • BOC members were stationed at the entrance, restricting public access (T/S 0:00:02).
- 12 • BOC members given **exclusive access to a closed public library** (T/S 0:05:08).
- 13 • BOC Director **Stacey Spain** issued instructions on security (T/S 0:09:19).
- 14 • Library Director **Jeff Scott** confirmed BOC as a government partner (T/S 0:51:07).

#### 17 **✓ Unlawful Restrictions on Public Access & Viewpoint Discrimination**

- 18 • BOC members **prevented public recording** (T/S 0:00:46).
- 19 • Librarian **Kristen** selectively enforced a "child-only" entry rule (T/S 0:01:20).
- 20 • **Public library access was physically restricted** (T/S 0:32:04).
- 21 • **Library Director Jeff Scott denied press access** (T/S 0:32:11).

#### 24 **✓ First Amendment Retaliation & Unlawful Trespass Orders**

- 25 • Jeff Scott previously called the police on Plaintiff for recording in a public space (T/S
- 26 **0:34:00).**

- BOC members acted as security enforcers in a government facility (T/S 0:34:48).

#### ✓ Fourth Amendment & Due Process Violations

- BOC and library officials issued unlawful trespass orders without due process.
- Public resources were misused for an event that falsely claimed not to be tax-funded (T/S 0:02:30).
- Library staff handed out political materials (Pride Flags) while wearing government ID badges (T/S 0:13:08).

#### ✓ Potential Battery & Use of Force by Our Center Members

- A BOC member who later committed battery on an elderly journalist at Sparks Library (Exhibit 28, July 15, 2023) was identified in the video (T/S 0:05:32).
- The Umbrella Brigade physically blocked public sidewalks, preventing certain individuals from using public space (T/S 1:05:14).

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## LEGAL RELEVANCE

#### ✓ First Amendment Violations (42 U.S.C. § 1983)

- Washoe County and Build Our Center selectively enforced access restrictions based on viewpoint.

- Video **proves unlawful restrictions on press coverage** and public access to government property.

#### ✓ **Fourth Amendment & Due Process Violations**

- Arbitrary trespass orders without due process show **discriminatory law enforcement**.
- Video evidence **contradicts** any claims that Plaintiff was a "disruption."

#### ✓ **Monell Liability (Municipal Policy or Custom)**

- Washoe County **permitted systemic viewpoint-based restrictions**.
- Video supports **Monell v. Dept. of Social Services, 436 U.S. 658 (1978)**.

#### ✓ **Refutes Defendant's Motion to Dismiss**

- **State Actor Nexus** is demonstrated through the **direct coordination between library officials and Build Our Center members** acting under color of law.

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### **CERTIFICATION**

I certify that the attached exhibit is a **true and correct copy** of the described evidence, submitted in accordance with the Local Rules of the **District of Nevada**.

**Dated:** March 17, 2025

**Respectfully submitted,**

/s/ **Drew J. Ribar**

**Pro Se Plaintiff**

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28 PLEADING TITLE - 5